

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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| PENNSYLVANIA GENERAL ENERGY |) |
| COMPANY, LLC, |) |
| |) |
| <i>Plaintiff,</i> |) |
| v. |) |
| |) |
| GRANT TOWNSHIP OF INDIANA |) |
| COUNTY AND THE GRANT |) |
| TOWNSHIP BOARD OF |) |
| SUPERVISORS, |) |
| |) |
| <i>Defendants.</i> |) |

DEFENDANTS' MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL

In accordance with LCvR 83.2(C) of this Court, Defendants Grant Township and the Grant Township Board of Supervisors request that Karen L. Hoffmann, Esq., of the firm Law Offices of Stanley J. Ellenberg, Esq., PC, Two Penn Center, 1500 John F. Kennedy Boulevard, Suite 1825, Philadelphia, PA 19102, be allowed to withdraw as counsel of record for Defendants in the above-captioned case, that she be removed from the electronic service list in this case, and that Terry J. Lodge, Esq., 316 N. Michigan Street, Suite 520, Toledo, OH 43604 be substituted as counsel for Defendants.

Good cause for the Motion exists: the Township is already represented by counsel and Ms. Hoffmann's continued representation is unnecessary. Mr. Lodge has entered an appearance for the Township in this case¹ and is familiar with the Court's scheduling order of October 19, 2022. (ECF No. 27.)

¹ Mr. Lodge initially appeared in this case *pro hac vice*, sponsored by Ms. Hoffmann. (ECF No. 19.) As Mr. Lodge is now fully admitted to the Bar of the U.S. District Court for the Western District of Pennsylvania, he is concurrently filing a Praeclipe to Enter Appearance in this case.

This withdrawal and substitution of counsel is not sought for purposes of delay and will not cause material adverse effect on Defendants' interests, cause harm to the administration of justice, or prejudice any party. *Miller v. Native Link Constr., LLC*, No. CV 15-160-5, 2019 WL 1277172, at *1 (W.D. Pa. Jan. 29, 2019).

WHEREFORE, the undersigned counsel respectfully requests that the Court grant this Motion and (1) permit Karen L. Hoffmann to withdraw as counsel of record for Defendants, (2) remove Ms. Hoffmann from the electronic service list in this case, and (3) substitute Terry J. Lodge as counsel of record for Defendants.

Dated: November 14, 2022

Respectfully submitted:

/s/ Terry J. Lodge
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2022, I electronically filed the foregoing by using the Court's CM/ECF system. I certify that all parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system.

Dated: November 14, 2022

/s/ Terry J. Lodge

Terry J. Lodge, Esq.